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Attorneys for Plaintiff
**PHOTOGRAPHIC ILLUSTRATORS
CORPORATION**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Pursuant to Civil Local Rule 6-2, Plaintiff PHOTOGRAPHIC ILLUSTRATORS CORPORATION and Defendant SPOT LIGHTING SUPPLIES, INC. hereby stipulate as follows:

1. The parties have agreed to an extension for SPOT LIGHTING SUPPLIES, INC.'s responses to written discovery requests from PHOTOGRAPHIC ILLUSTRATORS CORPORATION to February

1 10, 2015;

- 2 2. PHOTOGRAPHIC ILLUSTRATORS CORPORATION's 30(b)(6)
3 depositions of SPOT LIGHTING SUPPLIES, INC. to occur on or
4 before February 16, 2015 but no earlier than February 11, 2015;
5 3. The Deadline to move to compel further responses to discovery:
6 February 23, 2015;
7 4. The deadline for Expert disclosures: March 13, 2015; and
8 5. The Expert discovery cut-off: May 15, 2015.

9 The parties are engaging in settlement discussions at this time and desire to attempt to
10 resolve this matter prior to completing the above-referenced discovery. Counsel for Defendant
11 was in trial from January 5th through January 13th in the San Jose branch of this Court on another
12 case, (5:08-cv-05296-PSG), which was only set for trial in October 2014. At the pretrial
13 conference in the San Jose case on December 16, 2014, the Court also ordered additional fact
14 and expert discovery to take place prior to December 31, 2014, even though discovery had
15 previously closed in 2011 in that matter. Defense counsel's trial, pretrial deadlines, ordered
16 discovery and trial preparation for the January 5, 2015 trial impacted the parties' ability to have
17 meaningful settlement discussions and complete discovery in this matter, following the
18 December 11, 2014 Early Neutral Evaluation and prior to the previously set deadlines.

19 There have been no prior modifications of any of the deadlines set by this Court in this
20 matter.

21 Trial in this matter is set for November 9, 2015, with a Pretrial conference on October
22 27, 2015. The deadline for Motion hearings is August 20, 2015. These deadlines are not
23 affected by the requested scheduling change.

24 As PHOTOGRAPHIC ILLUSTRATORS CORPORATION does not so stipulate,
25 Defendant SPOT LIGHTING SUPPLIES, INC. reserves its right to move the Court for leave to
26 complete its 30(b) deposition of PHOTOGRAPHIC ILLUSTRATORS CORPORATION,
27 should the matter not resolve in February as a result of the parties' settlement negotiations.
28

IT IS SO STIPULATED:

DATED: January 21, 2015

PHILLIPS, SPALLAS & ANGSTADT LLP

By: s/ Jessica Stuart Pliner
Todd A. Angstadt, Esq.
Jessica Stuart Pliner, Esq.
Attorneys for Defendant
SPOT LIGHTING SUPPLIES, INC.

DATED: January 21, 2015

HOPKINS & CARLEY, A LAW CORPORATION

By: s/ Aleksandr Korzh
John V. Picone , III, Esq.
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PHOTOGRAPHIC ILLUSTRATORS
CORPORATION

I, Jessica Stuart Pliner, am the ECF user whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that the counsel whose e-signatures appear on the foregoing pages have concurred with this filing.

/s/ Jessica Stuart Pliner
Jessica Stuart Pliner

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: January 23, 2015

**HONORABLE Vince Chhabria
United States District Judge**